



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

September 23, 2005

Certified Mail No. 7004 1160 0005 8739 4687

Rick Culpepper
Potlatch Corporation
P.O. Box 788
Post Falls, Idaho 83877

RE: Facility ID No. 055-00018, Potlatch Corporation, Post Falls
Final Permit Letter

Dear Mr. Culpepper:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-050104 to Potlatch Corporation, Post Falls, (Potlatch, Post Falls) in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on February 2, 2005. This permit is effective immediately. This permit does not release Potlatch, Post Falls from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Coeur d'Alene will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/AC/sd
Enclosures

Permit No. P-050104



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050104

FACILITY ID No.: 055-00018

AQCR: 62

CLASS: A

SIC: 2493

ZONE: 11

UTM COORDINATE (km): 506.7, 5283.5

1. PERMITTEE

Potlatch Corporation – Post Falls

2. PROJECT

Permit Modification – Sanderdust project

3. MAILING ADDRESS

P.O. Box 788

CITY

Post Falls

STATE

ID

ZIP

83877

4. FACILITY CONTACT

Rick Culpepper

TITLE

Plant Manager

TELEPHONE

(208) 773-7521

5. RESPONSIBLE OFFICIAL

Rick Culpepper

TITLE

Plant Manager

TELEPHONE

(208) 773-7521

6. EXACT PLANT LOCATION

Potlatch Road and Seltice Way

COUNTY

Kootenai

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Particleboard Manufacturing

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: September 23, 2005

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO_x	nitrogen oxides
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	potential to emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050104

Permittee:	Potlatch Corporation	Facility ID No. 055-00018	Date Issued:	September 23, 2005
Location:	Post Falls, Idaho			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 This PTC is a modification to the facility's existing PTC. This PTC modification changes the following:
- PM₁₀ and VOC emissions resulting from physical and operation changes to the sanderdust system;
 - Eliminates production limit and formaldehyde emissions limit; and
 - Establishes federally enforceable limits on HAPs.
- 1.2 This PTC replaces PTC No. P-010101, issued on August 17, 2001, the terms and conditions of which shall no longer apply.
- 1.3 The following is a chronological history of the permits issued at this facility which are no longer in effect.
- Permit to Construct No. P-010101, issued August 17, 2001
 - Permit to Construct No. 0860-0018, issued February 1, 1985
 - Permit to Construct, letter issued November 25, 1980
 - Permit to Construct, letter issued January 10, 1974

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Drag Chain	Drag Chain Baghouse BH-1
2	Rotex Screens #1, #2; Hammermills	Hammermill Cyclone Baghouse BH-3A
2	Blender, Former	Scalper Air System Baghouse BH-5, Outside Silo High Pressure Air System Baghouse BH-5A
2	Board Cooler, Process Fugitives, Rip & Trim Saws	East Sawline Baghouse BH-10A, West Sawline Baghouse BH-10
2	Board Trim Hog	Reclaim Baghouse BH-3
2	Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6
2	Sander	Sander Air System Baghouse BH-7
2	Boiler Fuel Overs	Sanderdust Overs Baghouse
2	Boiler	Electrostatic Precipitator
2	Particle Dryer	Multiclone
2	Press	None

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2. PARTICLEBOARD MANUFACTURING**2.1 Process Description**

The facility processes wood shavings into particleboard by milling wood shavings into an acceptable size, drying to acceptable moisture content, mixing the milled shavings with resin, and pressing the milled shavings and resin mixture into particleboard.

2.2 Emissions Control Description

Emissions from the hammermill and Rotex screens are controlled by hammermill cyclone baghouse BH-3A. Emissions from the board trim hog are controlled by reclaim baghouse BH-3. The hammermill cyclone baghouse and reclaim baghouse vent to a single stack, the hammermill baghouse/reclaim baghouse stack. Emissions from the blender and former are controlled by scalper air system baghouse BH-5 and outside silo high pressure air system baghouse BH-5A. Both baghouses vent to through the scalper baghouse stack. Table 2.1 lists the emission units, their emission control device, and their emissions point.

Table 2.1 PARTICLEBOARD MANUFACTURING DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Drag Chain	Drag Chain Baghouse BH-1	Drag Chain Baghouse Stack
Rotex Screens #1, #2; Hammermills	Hammermill Cyclone Baghouse BH-3A	Hammermill Baghouse/ Reclaim Baghouse Stack
Blender, Former	Scalper Air System Baghouse BH-5, Outside Silo High Pressure Air System Baghouse BH-5A	Scalper Baghouse Stack
Board Cooler, Process Fugitives, Rip & Trim Saws	East Sawline Baghouse BH-10A, West Sawline Baghouse BH-10	East/West Sawline Baghouses' Stack
Board Trim Hog	Reclaim Baghouse BH-3	Hammermill Baghouse/ Reclaim Baghouse Stack
Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6	Sanderdust Storage Silo Stack
Sander	Sander Air System Baghouse BH-7	Sander Air System Baghouse
Boiler Fuel Overs	Sanderdust Overs Baghouse	Sanderdust Overs Baghouse Tack
Boiler	Electrostatic Precipitator	Electrostatic Precipitator Stack
Particle Dryer	Multiclone	Particle Dryer Multiclone Stack
Press	None	North, East, & West Press Vents

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Emissions Limits**2.3 Facility-Wide HAP Emissions Limits**

- By no later than June 30, 2007, facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- By no later than June 30, 2007, facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.

2.4 Opacity Limit

Emissions from the any stack, vent, or functionally equivalent opening associated with the particleboard press, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements**2.5 Performance Test**

The permittee shall conduct a performance test to measure formaldehyde, methanol, and total HAP emissions from the press vents and East & West Sawline baghouses in accordance with the procedures outlined in Table 2.3, or a DEQ-approved alternative method, no later than June 30, 2007. Total hazardous air pollutant emissions means, as defined by 40 CFR 63.2292, the sum of the emissions of the following six compounds: acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. The performance test shall be used to develop emission factors for formaldehyde, methanol, and total HAP emissions from the press vents and East & West Sawline baghouses in order to demonstrate compliance with the emission rate limit listed in Permit Condition 2.3.

Table 2.3 Performance Test Methods

Pollutant	Performance Test Method
Formaldehyde	Method 0011 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Publication No. SW-846) for formaldehyde; OR the NCASI Method CI/WP-98.01 (IBR, see § 63.14(f)); OR the NCASI Method IM/CAN/WP-99.02 (IBR, see § 63.14(f)).
Methanol	Method 308 in appendix A to 40 CFR part 63; OR Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method CI/WP-98.01 (IBR, see § 63.14(f)); OR the NCASI Method IM/ CAN/WP-99.02 (IBR, see § 63.14(f)).
Total HAP	Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method IM/CAN/WP-99.02 (IBR, see § 63.14(f)); OR ASTM D6348-03 (IBR, see § 63.14(b)) provided that percent R in Annex A5 of ASTM D6348- 03 is equal or greather than 70% and less than or equal to 130%.

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During the performance test, the manufacturing process shall be operated at a minimum of 90% of the maximum furnish usage rate.

2.6 Pressure Relief Valve Operation

The boiler steam shall not be superheated and the maximum pressure shall be limited to 300 psi absolute, by means of a pressure relief valve which bears the "Valve Repair (VR) Stamp" of a certified valve repair company that is recognized by the loss prevention insurance carrier. The stamp on the pressure relief valve and the associated documentation shall be maintained on site and made available for review by DEQ representatives upon request.

2.7 Pressure Differential

The pressure differential across each emission control device listed in Table 2.1, Permit Condition 2.2, shall be maintained within manufacturer and O&M manual recommendations and specifications.

2.8 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for the emission control devices listed in Table 2.1, Permit Condition 2.2, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements**2.9 Furnish Usage Records**

For the particleboard process, the permittee shall monitor and record monthly the furnish usage of the process. The furnish usage records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.

2.10 HAP Monitoring Requirements

The permittee shall monitor and record the monthly and annual HAP emissions from the press vents and East & West Sawline baghouses using the emission factors and furnish usage records required by Permit Conditions 2.5 and 2.9, respectively, to demonstrate compliance with Permit Condition 2.3. The permittee shall monitor and record the monthly and annual HAP emissions from sander air system, particle dryer, and boiler using the furnish usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.3. Annual facility-wide HAP emissions, expressed in tons per year (TPY), shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

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2.11 Pressure Drop

When operating, the permittee shall monitor and record once per day, the pressure differential across each emission control device listed in Table 2.1, Permit Condition 2.2, to demonstrate compliance with Permit Conditions 2.7 and 2.8.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

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Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.